

REMARKS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-24 are presently active, with Claims 1-8 and 15-20 withdrawn as directed to a non-elected invention. Claims 9, 10, 13, and 14 have been amended and claims 21-24 are newly added by the present amendment. The changes to the claims are supported by the originally filed specification and do not add new matter.

In the outstanding Office Action, the specification was objected to as containing various informalities on pages 4 and 22; the Examiner indicated that formal drawings must be submitted; and Claims 9-14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,684,715 to Palmer (hereinafter "the '715 patent") in view of U.S. Patent No. 6,404,901 to Itokawa (hereinafter "the '901 patent").

In response to the objections to the specification, the specification has been amended on pages 4 and 22 as suggested in the Office Action. Accordingly, the objections to the specification are believed to have been overcome.

Regarding the drawings, submitted herewith is a Letter Submitting Drawing Sheets along with 14 replacement drawing sheets.

Amended Claim 9 is directed to a video data description method, comprising: (1) extracting feature data of a predetermined object and feature data of a background area from a frame of an input video; (2) describing the feature data of the predetermined object and the feature data of the background area as a descriptor of the frame, *the feature data of the predetermined object including color information of an area of the predetermined object*; and (3) attaching the descriptor to the frame. Claim 9 has been amended to clarify that the feature data of the predetermined object includes color information of an area of the predetermined

object. The changes to Claim 9 are supported by the originally filed specification and do not add new matter.¹

Applicants respectfully submit that the rejections of Claim 9 (and dependent Claims 10-13) are rendered moot by the present amendment to Claim 9.

Regarding the rejection of Claim 9 under 35 U.S.C. § 103, the Office Action asserts that the '715 patent discloses everything in the claims with the exception of extracting feature data of a background area from a frame and describing the feature data of the background area as a descriptor of the frame, and relies on the '901 patent to remedy the deficiency.

The '715 patent is directed to an interactive video system with dynamic video object descriptors. As shown in Figure 3, the video object descriptor 60 includes an attribute part 62 that includes ID positive, shape, size, layering, duration, action, and action parameters. However, the attribute part 62 does not include color information of an area of a predetermined object, as recited in amended Claim 9.

Turning now to the secondary reference, the '901 patent is directed to an image processing apparatus and method in which image data is divided into a background portion and a foreground portion by the calculation of a moving vector for each block in a frame. As shown in Figure 6 of the '901 patent, a moving vector 601 of the background portion and a moving vector 602 of the foreground portion are respectively calculated among sequential frames. However, the '901 patent fails to disclose that color information of an area of a predetermined object is extracted from a frame of an input video.

Thus, no matter how the teachings of the '715 and '901 patents are combined, the combination does not teach or suggest describing feature data of a predetermined object and feature data of the background area as a descriptor of the frame, wherein *the feature data of the predetermined object includes color information of an area of the predetermined object*,

¹ See, e.g., Figure 10B.

as recited in amended Claim 9. Accordingly, Applicants respectfully submit that amended Claim 9 patentably defines over any proper combination of the '715 and '901 patents.

Amended Claim 14 recites limitations analogous to the limitations recited in amended Claim 9. Moreover, Claim 14 has been amended in a manner analogous to the amendment to Claim 9. Accordingly, for the reasons stated above for the patentability of Claim 9, Applicants respectfully submit that the rejection of Claim 14 is rendered moot by the present amendment to that claim.

The present amendment also sets forth new dependent Claims 21-24 for examination on the merits. New Claims 21 and 23, which depend from Claims 9 and 14, respectively, recite that the feature data of the predetermined object includes at least one of a moving vector and an affine transformation coefficient. New Claims 21 and 23 are supported by the originally filed specification and do not add new matter.² New Claims 22 and 24, which depend from Claims 9 and 14, respectively, recite that the feature data of the background area includes at least one of color information and camera-work information describing an operation of a camera used for the input video. New Claims 22 and 24 are supported by the originally filed specification and do not add new matter.³ Moreover, based on the asserted patentability of independent Claims 9 and 14, Applicants respectfully submit that new Claims 21-24 patentably define over any proper combination of the '715 and '901 patents.

Thus, it is respectfully submitted that independent Claim 9 (and dependent Claims 10-13, 21, and 22) and independent Claim 14 (and dependent Claims 23 and 24) patentably define over both the '715 and '901 patents.

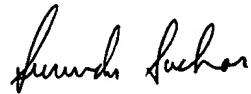
² See, e.g., Figure 10B.

³ See, e.g., Figure 10C.

Consequently, in view of the present amendment and in light of the above discussion, the outstanding grounds for rejection are believed to have been overcome. The application as amended herewith is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.



Eckhard H. Kuesters
Attorney of Record
Registration No. 28,870
Surinder Sachar
Registration No. 34,423



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Tel: (703) 413-3000
Fax: (703) 413 -2220

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